

## **REMARKS**

Claims 1-29 were pending in the Application prior to the outstanding Office Action. On p. 2 of the Office Action, the Examiner subjected claims 1-29 to a restriction requirement under 35 U.S.C. §121, alleging that the application contains claims directed to the following inventions:

Invention I: Claims 1-18

Invention II: Claims 19-29

Applicants have canceled Claims 1 – 7 and 10 – 29, and have added new Claims 30 – 37. Currently pending are Claims 8, 9 and 30 – 37. Applicants select Invention I - covering claims 8, 9 and 30-37 for prosecution on the merits for this application.

### **I. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103(a)**

On page 3 of the Office Action, the Examiner rejected Claims 1 – 28 under 35 U.S.C. 103(a) over U.S. Patent 6,185,474 (“Nakamura”) in view of U.S. Patent 6,256,330 (“Soraoka”). Claims 1 – 7 and 10 – 18 have been canceled. Applicants respectfully traverse the rejection of Claims 8 and 9.

Nakamura discloses a network of exposure control units in a semiconductor fabrication facility. Each exposure control unit is able to exchange information with a host controller to facilitate maintenance and management of exposure work information. In the control architecture of Nakamura, host computer 30 communicates with semiconductor exposure units 10 for monitoring and control. The semiconductor exposure units 10 do not communicate among themselves, and neither host computer 30 nor semiconductor exposure units 10 employ a plurality of control threads. The Examiner suggested that the semiconductor exposure units 10 could be construed as a “neighborhood.” However, semiconductor exposure units 10 do not include a plurality of electromechanical devices wherein each electromechanical device is monitored and controlled by a separate control thread.

Soraoka discloses a vacuum processing apparatus for use in a semiconductor fabrication facility. Soraoka does not disclose any details of a control architecture of the vacuum processing apparatus.

**A. Independent Claim 8 is Patentable Over Nakamura In View of Soraoka**

Neither Nakamura nor Soraoka, separately or in combination, disclose a control logic computer including first and second control threads in which the first control thread monitors and controls a first electromechanical device and the second control thread monitors and controls a second electromechanical device, as recited in Claim 8. Further, neither Nakamura nor Soraoka, separately or in combination, disclose a first control thread communicating with a second control thread to cooperatively accomplish a goal involving movement of material, as recited in Claim 8. Therefore, Applicants respectfully assert that claim 8 is patentable over Nakamura in view of Soraoka.

**B. Dependent Claim 9 and 30 – 37 are Patentable over Nakamura In View of Soraoka.**

Dependent Claims 9 and 30 – 37 depend directly or indirectly from independent Claim 8 and include all of its limitations. For at least the reasons stated above with respect to Claim 8, dependent Claims 9 and 30 – 37 are patentable over Nakamura in view of Soraoka.

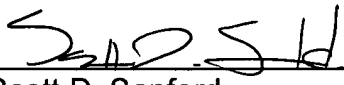
**Additional Remarks**

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application are allowable, and a Notice of Allowance is requested.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-3548 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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